

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

FRANCISCO ALMEIDA-LEÓN, WANDA CRUZ
QUILES, La Sociedad Legal de Gananciales entre
ellos, y JUAN ALMEIDA LEON

Plaintiffs

v.

WM Capital Management, Inc.; Juan del Pueblo,
Inc., John Doe, y Fulano de Tal, BM Capital de Tal
y Otros

Defendants

CIVIL ACTION NO. 16-1394

RE STATE COURT ACTION CASE

NO. KAC2016-0027 (806)

BREACH OF CONTRACT; DAMAGES;
LITIGIOUS CREDIT

**WM CAPITAL'S REQUEST FOR LEAVE TO FILE
IN EXCESS OF TWENTY FIVE (25) PAGES**

TO THE HONORABLE COURT:

COMES NOW, Defendant WM Capital Management, Inc. ("WM Capital"), as successor to the Federal Deposit Insurance Corporation as Receiver for R-G Premier Bank ("FDIC-R"), through its undersigned counsel and respectfully states:

1. On this date, WM Capital filed its Emergency Motion for Temporary Restraining Order and Permanent Injunction (ECF No. 502) ("the Motion").
2. Local Rule 7(e) provides that motions for injunctive relief shall not exceed fifteen (15) pages except by leave of the Court. The Motion is, however, including the signature page and certificate of service, thirty one (31) pages long or six (6) pages over the limit set by Local Rule 7(e).

3. WM Capital respectfully submits that the length of its Motion is appropriate given the legal issues addressed, the sheer amount of procedural background to recap, and the variety of relief being requested. Moreover, WM respectfully submits that the Motion is comprehensive and will assist the Court in ruling on the matter at hand.

WHEREFORE, WM Capital respectfully requests leave of this Honorable Court to file its Motion, with six (6) pages in excess of the twenty five (25) pages permitted under L. Civ. R. 7(e).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of August 2021.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

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